

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

**UNITED STATES OF AMERICA**

**vs.**

**RUSSELL LUCIUS LAFFITTE**

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CRIMINAL NO. 9:22-658-RMG

**GOVERNMENT’S RESPONSE TO DEFENDANT’S MOTION IN LIMINE TO  
PRODUCE REPORTS**

On September 26, 2022, the Defendant Russell Lucius Laffitte (“Laffitte”) filed a motion in limine “for the production of all reports and associated documents related to any witnesses in the Government’s investigation containing information or allegations of crimes or acts of moral turpitude, including fraud.” ECF No. 74. The Government is aware of its discovery obligations under *Brady* and *Giglio*. See *Brady v. Maryland*, 373 U.S. 83, 87 (1963) (holding that Due Process requires that the Government disclose to the accused any favorable evidence in its possession that is material to guilt or punishment); *Giglio v. U.S.*, 405 U.S. 150, 155 (1972) (applying the due process requirements enunciated in *Brady* to the right of defendants to secure from the prosecution disclosure of materials affecting the credibility of Government witnesses). The Government takes this case, and its accompanying discovery obligations, seriously. The Government has endeavored to comply with its obligations throughout discovery in this case, including its production of more than 150,000 pages thus far, and it will continue to do so as it prepares for trial.

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ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

By: s/ *Emily Limehouse*

Emily Evans Limehouse (Federal ID #12300)  
Winston D. Holliday, Jr. (Federal ID #7597)  
Kathleen Michelle Stoughton (Federal ID #12161)  
Assistant United States Attorney  
151 Meeting Street, Suite 200  
Charleston, South Carolina, 29402  
(843) 266-1663  
[Emily.Limehouse@usdoj.gov](mailto:Emily.Limehouse@usdoj.gov)

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